



G E O  
SPECIALTY CHEMICALS

201-15311

May 18, 2004

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Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attn: Chemical-Right-To-Know Program

Dear Administrator:

I am writing this letter in response to your letter, dated April 12, 2004, sent to Dr. Lester Bynum, GEO Specialty Chemicals, Inc. ("GEO"), Trimet Products Group, 2401 N. Cedar Crest Blvd., Allentown, Pa 18104.

I am the Vice President and General Manager for the business in GEO and want to affirm our commitment to the HPV Challenge Program. However, we are presently unable to fulfill our commitments due to GEO's financial condition. As you may be aware, GEO recently filed for bankruptcy protection before the United States Bankruptcy Court for the District of New Jersey, Case Number 04-19148.

Given GEO's financial condition over the past two years, participation in the program for this product, Propanoic acid, 3-hydroxy-3-(hydroxymethyl)-2-methyl, CAS #4767-03-7, has not started. While the performance of testing will be impractical during 2004, GEO looks forward to emerging from bankruptcy protection in the near future. After emergence from bankruptcy protection, it is current management's hope that funds will be provided by a reorganized entity to fulfill the testing requirements for the HPV Challenge Program.

If you have any questions or would like to discuss in more detail, please contact me.

Sincerely,

Robert S. Zacker  
Vice President & General Manager

Cc: File - HPV Challenge  
T. Glass/P. Dluzeski/S. Schillon/M. Weber